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CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
17 CB

**§ CRIMINAL NO. EP-17-CR-**

§  
§ INDICTMENT

§ **CT 1-5:** 18 U.S.C. § 924(a)(1)(A) –  
 § Providing False Information on Records  
 § Required to be Maintained by a Federal  
 § Firearms Licensee.

**§ Firearms Licensee.**

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**EP 17 CR1568**

**COUNT ONE**

That on or about March 10, 2017, within the Western District of Texas, the Defendant,

knowingly made false statements and representations to C.G.S., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of C.G.S. in that when defendant executed an ATF Form 4473, Firearms Transaction Record, defendant falsely indicated that he was the actual buyer of the firearms, when in fact defendant was purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 924(a)(1)(A).

**COUNT TWO**  
**(18 U.S.C. § 924(a)(1)(A))**

That on or about March 17, 2017, within the Western District of Texas, the Defendant,

**MARCO ANTONIO VALLEJO, JR.**

knowingly made false statements and representations to C.G.S., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of C.G.S. in that when defendant executed an ATF Form 4473, Firearms Transaction Record, defendant falsely indicated that he was the actual buyer of the firearms, when in fact defendant was purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 924(a)(1)(A).

**COUNT THREE**  
**(18 U.S.C. § 924(a)(1)(A))**

That on or about March 23, 2017, within the Western District of Texas, the Defendant,

**MARCO ANTONIO VALLEJO, JR.**

knowingly made false statements and representations to C.G.S., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of C.G.S. in that when defendant executed an ATF Form 4473, Firearms Transaction Record, defendant falsely indicated that he was the actual buyer of the firearms, when in fact defendant was purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 924(a)(1)(A).

**COUNT FOUR**  
**(18 U.S.C. § 924(a)(1)(A))**

That on or about March 31, 2017, within the Western District of Texas, the Defendant,

**MARCO ANTONIO VALLEJO, JR.**

knowingly made false statements and representations to C.G.S., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of C.G.S. in that when defendant executed an ATF Form 4473, Firearms Transaction Record, defendant falsely indicated that he was the actual buyer of the firearms, when in fact defendant was purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 924(a)(1)(A).

**COUNT FIVE**  
**(18 U.S.C. § 924(a)(1)(A))**

That beginning on or about April 11, 2017, and ending on or about April 13, 2017, within the Western District of Texas, the Defendant,

**MARCO ANTONIO VALLEJO, JR.**

knowingly made false statements and representations to M.T.F., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of M.T.F. in that when defendant executed an ATF Form 4473, Firearms Transaction Record, defendant falsely indicated that he was the actual buyer of the firearms, when in fact defendant was

purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 924(a)(1)(A).


A TRUE BILL

ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

RICHARD L. DURBIN  
UNITED STATES ATTORNEY

BY:

  
\_\_\_\_\_  
Assistant U.S. Attorney